

## STATEMENT OF FACTS

Your affiant, [REDACTED], is a Special Agent assigned to the FBI's Washington Field Office. In my duties as a Special Agent, I investigate violations of federal law. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

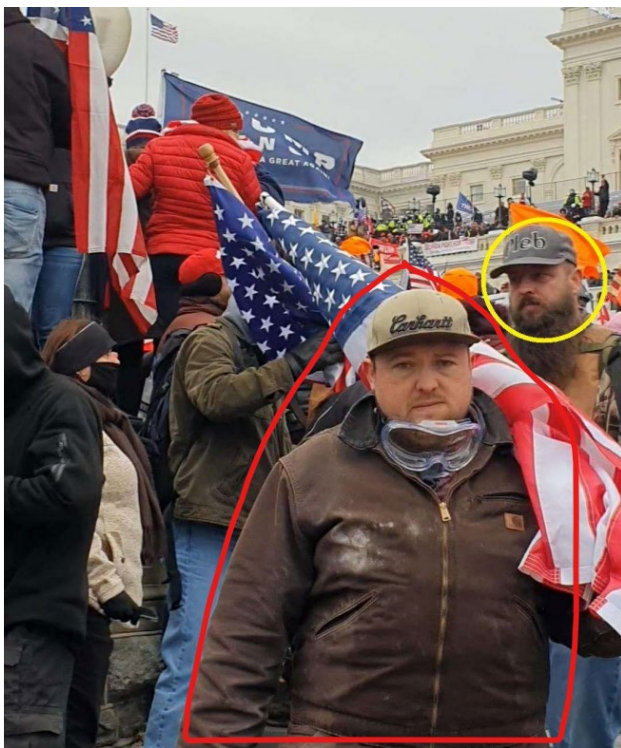
At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m., members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there.

## IDENTIFICATION OF SUBJECTS

Over the course of this investigation, your affiant has reviewed publicly available footage from the Washington Monument and U.S. Capitol, as well as USCP CCTV Metropolitan Police Department (MPD) bodyworn camera (BWC) footage from the U.S. Capitol on January 6. The following description is based on the review of that content. Said footage captured both DONALD ROSS WORKMAN JR. and JOHN WALTER CLARK IV on Capitol Grounds on January 6, 2021.



*Image 1: CLARK (red) and WORKMAN (yellow) on Capitol Grounds on January 6.*

### ***Identification of DONALD ROSS WORKMAN Jr.***

DONALD ROSS WORKMAN JR., of Hereford, Texas, is a white male who on January 6, 2021, wore a distinctive gray baseball hat with “PLEB” in large letters on its front and a long, unkempt brown beard.

WORKMAN posts videos to YouTube and Rumble under the name “Pleb Media.” WORKMAN also operates an account on the social media platform formerly known as Twitter under the handle @heloprocmnt with name “Don ‘The Pleb’ Workman.”

On both the Twitter and YouTube pages, WORKMAN posted an avatar-style image of himself wearing what appears to be the same “PLEB” baseball hat and a similar beard. Your affiant is able to identify the individual posted on these social media platforms as the same person depicted in videos from January 6, 2021, as described below.



Image 2: Header of WORKMAN's Twitter account.

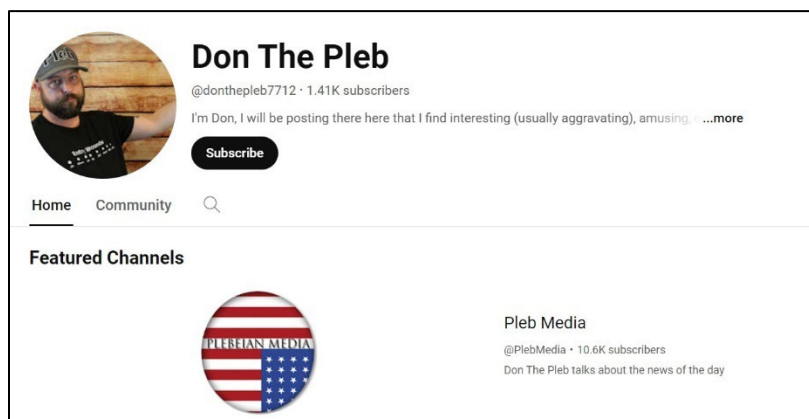


Image 3: Header of WORKMAN's YouTube channel.

The images in these social media account avatars appear to match both WORKMAN's driver's license photo and his appearance in multiple videos posted to various online fora, including on January 6.

On the evening of January 6, 2021, WORKMAN hosted a livestream on his YouTube "Pleb Media" channel that lasted approximately an hour and a half. During the livestream, WORKMAN wore the same "PLEB" hat that he had worn on Capitol grounds.



*Image 4: Screenshot from WORKMAN's livestream the evening of January 6.*

During the livestream session, WORKMAN admitted to being on Capitol grounds that day. He stated he was “legitimately fighting the cops in riot gear for about six hours” and described being “pepper sprayed and bear maced” by the police.

According to records obtained through a search warrant served on Google, a mobile device associated with email address [REDACTED], which your affiant knows to be associated with WORKMAN, was present at the U.S. Capitol on January 6, 2021. Google estimates device location using sources including GPS data and information about nearby Wi-Fi access points and Bluetooth beacons. This location data varies in its accuracy, depending on the source(s) of the data. As a result, Google assigns a “maps display radius” for each location data point. Thus, where Google estimates that its location data is accurate to within 10 meters, Google assigns a “maps display radius” of 10 meters to the location data point. Finally, Google reports that its “maps display radius” reflects the actual location of the covered device approximately 68% of the time. In this case, Google location data shows that a device associated with email address [REDACTED] was located on the West Front of the Capitol. The earliest point reported by Google as being within the Capitol’s restricted perimeter occurred at 2:04:45 p.m. and the latest occurred at 5:19:39 p.m. Google provided 15 discrete device location points. For each, the entirety of the “maps display radius” fell within the Capitol’s restricted perimeter. No point appeared to be located within the Capitol building itself.

FBI agents interviewed WORKMAN in Texas on or about June 14, 2023. Regarding January 6, WORKMAN stated all of his actions were “well-documented” and publicly available on the Internet, and declined to speak further.

#### ***Identification of JOHN WALTER CLARK IV***

JOHN WALTER CLARK IV, of Hereford, Texas, is a white male who on January 6, 2021, wore a Carhartt-brand baseball hat with a nearly flat brim with sunglasses visible on the brim at times, clear goggles, a Carhartt-brand brown coat, and brown overalls.

CLARK and WORKMAN moved together throughout nearly all of their time on restricted Capitol grounds on January 6. CLARK stayed very physically close to WORKMAN, at times

placing a hand on WORKMAN's collar area in an apparent effort to not lose contact with him in the crowd of rioters. This indicates a certain level of familiarity.



*Image 5: CLARK (red) and WORKMAN (yellow) on Capitol grounds.*

An FBI confidential human source (CHS) identified this associate as JOHN WALTER CLARK IV.

CLARK obtained a Texas driver's license in or about June 2022. His address associated with this license is a property in Hereford, Texas, owned by WORKMAN, according to public records. Further, an entity named "Pleb Media" is registered at this address. "Pleb Media" is the brand under which WORKMAN publishes videos online as a self-described content creator.

CLARK registered a pickup truck in Texas, and received license plates for it in or about February 2023. The address associated with the vehicle registration was the same aforementioned property owned by WORKMAN in Hereford, Texas.

According to CLARK's LinkedIn profile, he was a field radio operator in the United States Marine Corps (USMC) from 2007 to 2011. WORKMAN was also in the USMC in approximately the same timeframe.

## **WORKMAN'S AND CLARK'S CONDUCT ON JANUARY 6**

### ***Washington Monument***

On the morning of January 6, WORKMAN and CLARK attended the "Stop the Steal" rally at the Washington Monument. There, United States Park Police (USPP) uniformed officers took an individual into custody, leading WORKMAN, CLARK, and others to aggressively advance upon the officers.

In response to the crowd's actions, the USPP officers retreated into an enclosed glass structure, known as the Visitor Screening Center, at the base of the Washington Monument as

WORKMAN and others, including CLARK and another WORKMAN associate whose identity is known to the FBI,<sup>1</sup> approached the glass, where they yelled at and taunted the officers.

### *Approach to Capitol*

In the early afternoon, they headed east along the National Mall towards the Capitol. Along the way, WORKMAN filmed a livestream-style video that was originally posted to his Pleb Media YouTube channel. CLARK is visible behind WORKMAN.



*Image 6: CLARK (red) and WORKMAN (yellow) on the National Mall walking toward the Capitol.*

The following is a selection of WORKMAN’s statements during his livestream:

- WORKMAN stated “Congress fucks up the country. I’m going to the Capitol building.”
- WORKMAN described the arrest at the Washington Monument and stated, “Turns out, if you just rush a few hundred people onto the same Capitol—er, onto the same monument—and tell the cops they’re not fuckin’ arresting people, they’ll just leave. Quite literally, all it took.”
- WORKMAN stated, “By the way, if Trump gets up there and says ‘we concede’ somebody let me know.”
- When WORKMAN is asked what the plan is, he responds, “I’m walking my ass to the fuckin’ Capitol building, ‘cause apparently we are going to sit there until right around the time Congress is supposed to be over here fuckin’ voting.” Shortly thereafter, one of WORKMAN’s associates noted that C-SPAN was covering the chamber live.

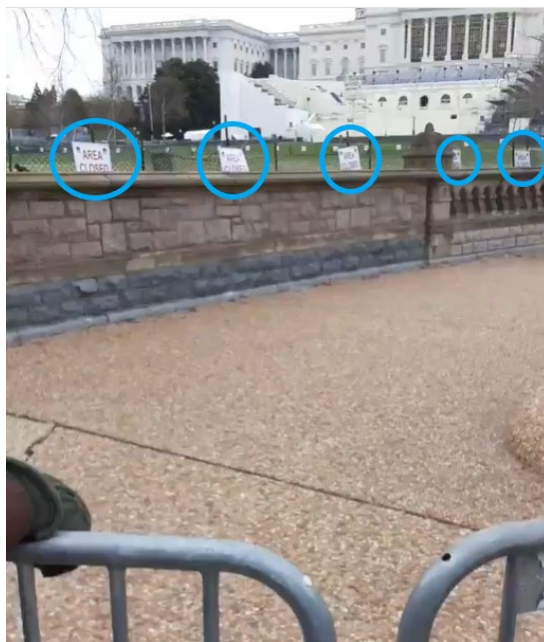
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<sup>1</sup> The identity of this associate is known to the FBI. This person is not CLARK.

- WORKMAN states, “There’s a bunch of very unserious people here who are all happy to wave flags and cheer, and then there’s a much smaller percentage of us who are very pissed off and going to the Capitol building.”
- When WORKMAN is asked, “Are you expecting violence later? From Antifa and stuff?” he responds, “Yes.”
- WORKMAN estimates there are “40-50 of us standing here right now” in response to a question about the size of his group.
- When WORKMAN’s associate says, “Trump just said, if they don’t do the right thing, we’ll take a walk down to the Capitol,” WORKMAN responds, “Stop fucking around about it, get down here.”

### ***Capitol Walkway***

WORKMAN’s associate recorded a video at approximately 12:26 p.m., which shows a walkway leading to the Capitol building, and begins with the associate saying “Folks, you cannot get on Capitol grounds. Say hi, Don.” The camera turns to show WORKMAN. Numerous “AREA CLOSED” signs are visible directly in front of WORKMAN.



*Image 7: "AREA CLOSED" signs visible in WORKMAN's associate's video.*

While observing USCP officers on the west lawn of the Capitol grounds, the associate states, “Yeah, that’s not enough of ‘em for what’s comin’ in a half hour.” The first breach of Capitol restricted grounds occurred at 12:53 p.m., just north of where WORKMAN and his associate were standing during this video.

### ***WORKMAN and CLARK on Restricted Capitol Grounds***

WORKMAN and CLARK chased USCP officers who were running down a walkway toward restricted Capitol grounds.



*Image 8: CLARK (red) and WORKMAN (yellow) chasing police toward Capitol grounds.*

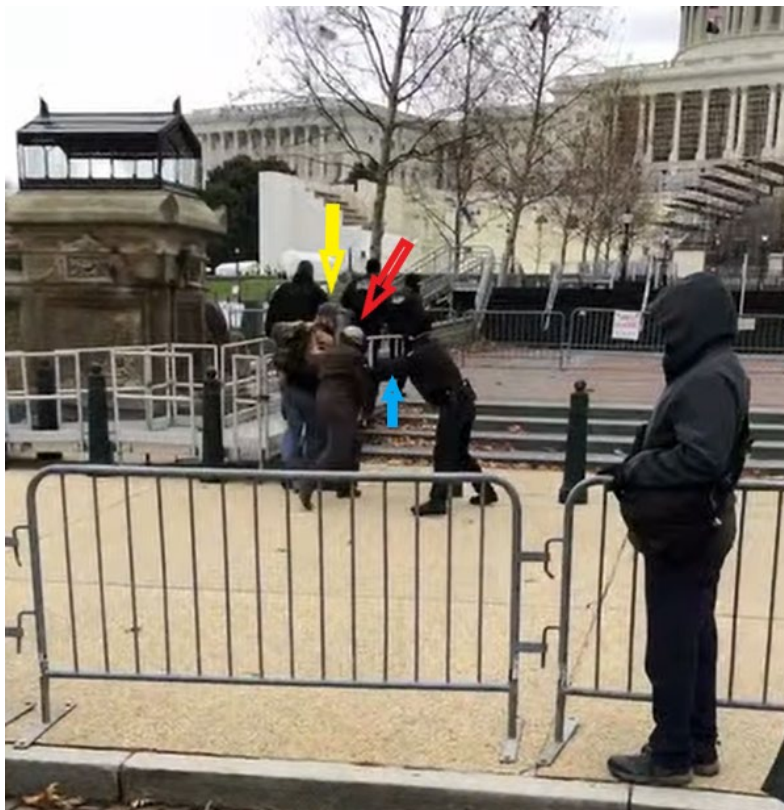
WORKMAN appeared to push a USCP officer who was attempting to prevent WORKMAN and CLARK from proceeding further onto restricted grounds.





*Image 9: WORKMAN's outstretched arm (yellow arrow) appearing to push a USCP officer. CLARK (red arrow) is immediately beside WORKMAN.*

When the USCP officer pushed WORKMAN back, CLARK put himself between WORKMAN and shouldered-checked the officer to get him away from WORKMAN.

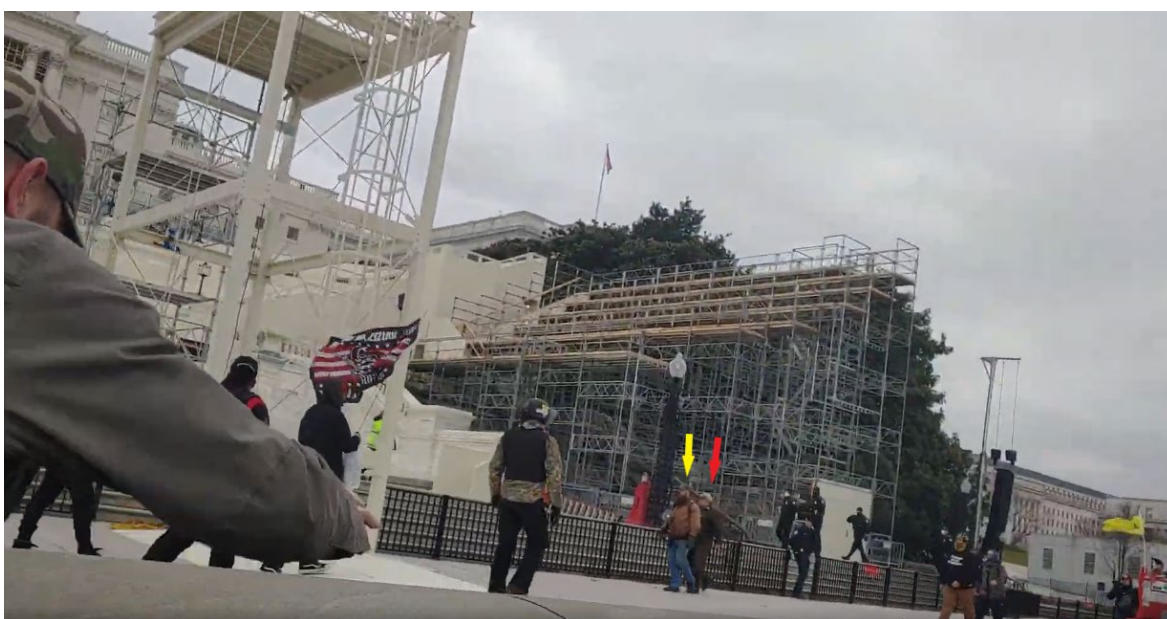


*Image 10: USCP officer's outstretched arm (blue arrow) pushing back on WORKMAN (yellow arrow) as CLARK (red arrow) put himself between them.*

WORKMAN and CLARK were among the very first rioters to breach the Capitol Police line on the Maryland Avenue walkway. Capitol closed-circuit video (CCV) showed WORKMAN and CLARK (in right red box) with police officers nearby. CLARK threw a bike rack barrier to the side (left red box) as he moved forward with WORKMAN.

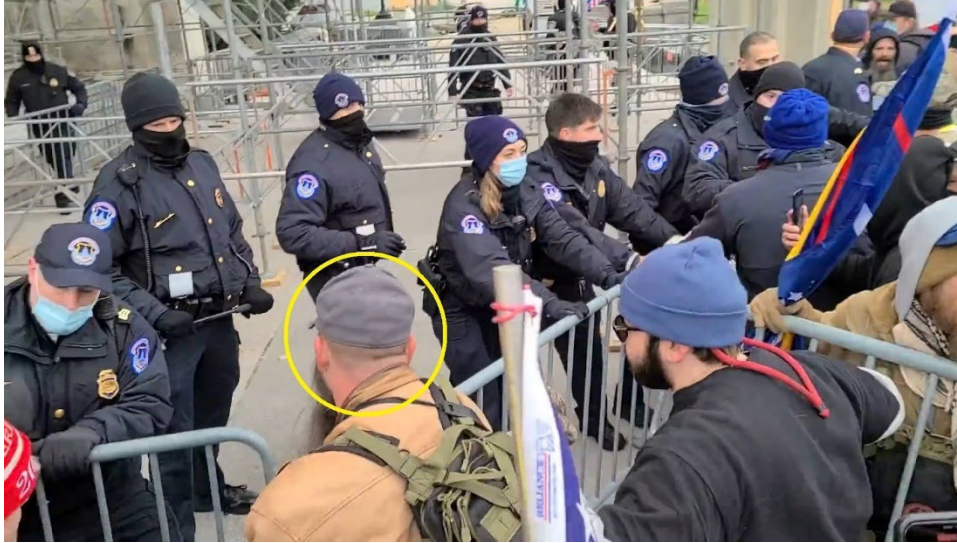


WORKMAN and CLARK arrived on the Capitol's Lower West Plaza early during the riot, as evidenced by the still-standing black fencing and relative lack of rioters.



*Image 11: WORKMAN (yellow) and CLARK (red) on the West Plaza.*

Once rioters breached the West Plaza, USCP personnel attempted to establish a bike rack barricade barrier on southern side of the plaza to prevent the rioters from proceeding further into the grounds or into the building itself. At approximately 12:59 p.m., WORKMAN, CLARK, and other rioters tried to prevent the police from doing so, by grabbing the barricades away from them.



*Image 12: WORKMAN confronting the police line that was assembling the bike rack barricade barrier.*



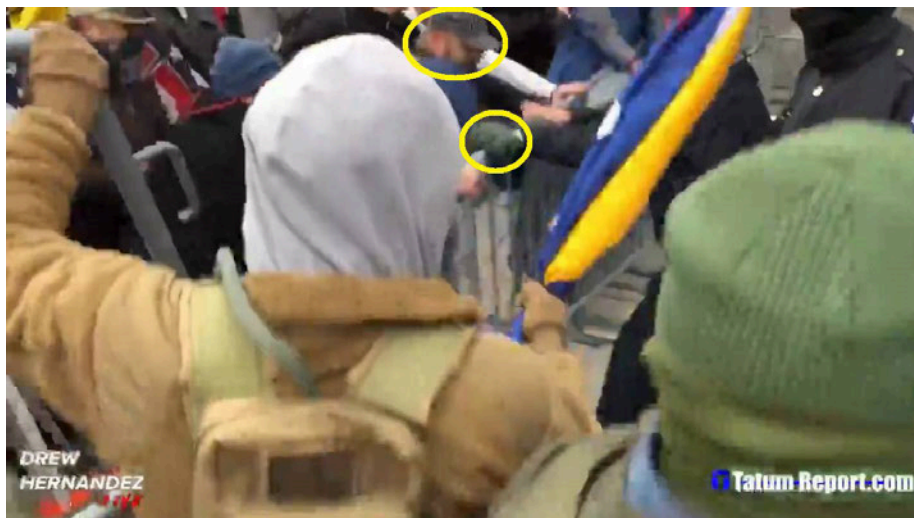
*Image 13: WORKMAN (yellow) grabbing a police barricade. CLARK (red) is behind him.*



*Image 14: WORKMAN (yellow) and CLARK (red), each grabbing a police barricade.*

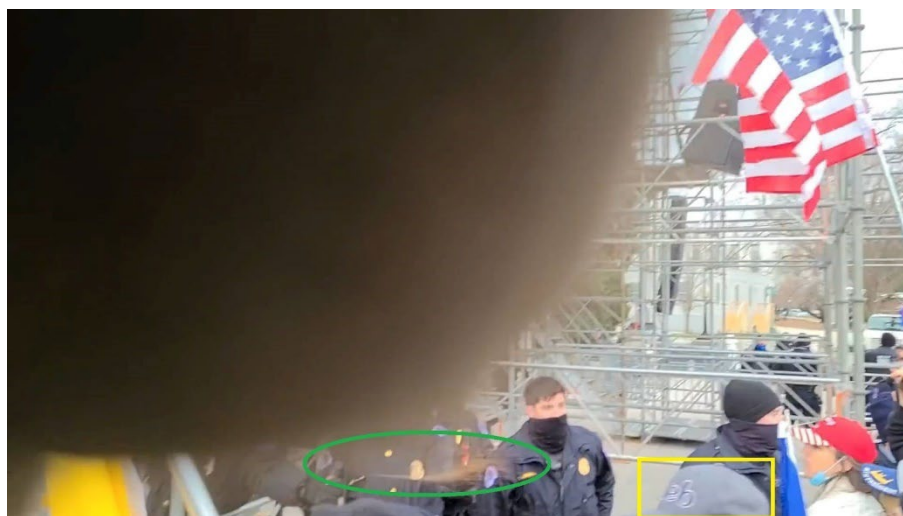


*Image 15: WORKMAN (yellow) pulling a police barricade away from an officer. CLARK (red) is behind him.*



*Image 16: A different angle of WORKMAN pulling a police barricade away from an officer.*

WORKMAN and CLARK remained at the vanguard of rioters opposing the police, even after the police sprayed the rioters with a chemical irritant.



*Image 17: Police deploying chemical spray (green) toward rioters, including WORKMAN (yellow).*



*Image 18: WORKMAN (yellow) and CLARK (red) after the police sprayed the rioters with a chemical irritant. WORKMAN dropped his head, using the brim of his hat to shield his face, and CLARK brought his hands toward his eyes.*

WORKMAN and CLARK remained on the front line of rioters as the struggle with USCP continued. They remained on the Lower West Plaza as the USCP deployed riot munitions, and as USCP officers fought to assist other officers who had been knocked off their feet.



*Image 19: CLARK (red) and WORKMAN (yellow) on the West Plaza as the police spray chemical irritants to repel the rioters.*

WORKMAN appeared to assist CLARK away from the police line at one point, leading him by the hand. CLARK is seen wincing, likely from the effects of the chemical spray.



*Image 20: WORKMAN (yellow) guiding CLARK (red) after having been sprayed with chemical irritant.*

Open-source video captured CLARK as he washed out his eyes. Both CLARK's and WORKMAN's faces and jackets show exposure to riot agents.<sup>2</sup>



At approximately 2:12 p.m., more than 70 minutes after WORKMAN and CLARK entered restricted Capitol grounds, then-Lieutenant J.B. of MPD repeatedly ordered the rioters in front of him, including WORKMAN and CLARK, to back up. They did not. Lieutenant J.B. sprayed the rioters with a chemical irritant. A few minutes later, WORKMAN taunted the police, saying, "Any of you feel free—come this side, here, happy to have your help," referring to the other side of the barricades.

<sup>2</sup> <https://odysee.com/@ChrisWyattAfrica:5/Capitol-Hill-Rally-06-Jan-2021-Revisited:4> at 9:24





*Image 21: CLARK (red) and WORKMAN (yellow) directly in front of Lt. J.B. as he deployed a chemical irritant after ordering the rioters to get back.*

At approximately 2:28 p.m., when the rioters broke through the police line and overran the West Plaza, WORKMAN ascended the stairs underneath the scaffolding with several other rioters to gain access to the Lower West Terrace of the Capitol building.



*Image 22: WORKMAN ascending the stairs to the Lower West Terrace.*

Several open-source videos captured WORKMAN and CLARK on the southern side of the Lower West Plaza. According one video's metadata, WORKMAN and CLARK were there at approximately 3:36 p.m.—over two and a half hours from when they first breached Capitol restricted grounds.



*Image 23: CLARK (red) and WORKMAN (yellow) on Capitol grounds at approximately 3:36 p.m.*

### ***WORKMAN's Livestream the Evening of January 6***

On the evening of January 6, WORKMAN conducted another livestream on his YouTube channel, during which he described his experience in Washington D.C. on January 6. During the livestream, he wore the same “Pleb” hat he was wearing earlier in the day. *See* Image 5.

The following is a selection of WORKMAN's statements during his livestream:

- WORKMAN stated he disregarded instructions from police at the Washington Monument and “as soon as they arrested the guy, we all just kinda rushed back onto the Washington Monument, which basically set the tone for the day.”
- WORKMAN states he was sprayed with chemical irritants, including pepper spray and tear gas. WORKMAN stated “they brought the big giant bear mace launchers, and I got bear maced a bunch of times. Very exciting.” WORKMAN notes his voice may sound off, opining “this is what you sound like when you yell through tear gas.”
- WORKMAN opines “None of us were chasing down the cops, trying to beat the hell out of them, until we started getting, fuckin’, the cops laying into us. Just quite literally walked up to fences that were there, said ‘fuck yo’ couch,’ walked past the fence, and then, uh, started getting hosed down with stuff. Realistically, most of the

injuries the police got today are of, ah—” At this point, WORKMAN’s associate,<sup>3</sup> who is present with him during the livestream, interjects, “retaliation.” WORKMAN continues “...not even retaliation, it is cops pepper-spraying them damn selves. They tear-gassed their own line more than once. Fuckin’ retards.”

- WORKMAN describes moving past police barricades at the Capitol building and encountering a lone police officer who deployed a collapsible baton. WORKMAN jubilantly relates, “...so I just pointed behind him and went, ‘you’re alone.’ And that bitch turned and ran.”
- When a real-time viewer asks why he and other rioters left the Capitol, WORKMAN responds, “Legitimately fighting the cops in riot gear for about six hours is really tiring.”
- WORKMAN states “what the right just found out today is that if you push back on the cops at all, the cops fold. A lot.”
- When a real-time viewer asks, “This was a nice warm-up, but boog<sup>4</sup> when?” WORKMAN responds, “Probably soon.”
- When a real-time viewer asks about his opinion on how the day went in terms of the protest and Trump, WORKMAN expresses his view that the day was successful in terms of the protest. In terms of Trump, WORKMAN states it was a mixed result and that “Pence, to the best of my knowledge, hasn’t done anything.” WORKMAN states his view that “a stolen election” was one of the reason January 6 kicked off.
- When a real-time viewer asks, “Is there anything to be done, or is it all over?” WORKMAN responds, “Look, for today, it’s probably—I mean, if you guys have some capability to organize 3 or 400,000 people to go down to D.C. and say ‘I thought we told you to stop that damn count’ then let’s go.”
- When a real-time viewer asks, “Is there any way for Trump to win now?” WORKMAN responds, “I mean, there’s always one way.” WORKMAN states “I’m near-certain we’re scheduling the boog for January 20.”

### **CHARGES SUPPORTED BY PROBABLE CAUSE**

Based on the foregoing, your affiant submits that there is probable cause to believe that WORKMAN and CLARK violated 18 U.S.C. §§ 1752(a)(1) and (2), which make it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do so; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions. For purposes of Section

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<sup>3</sup> The FBI has identified the associate present with WORKMAN during the livestream. It is not CLARK.

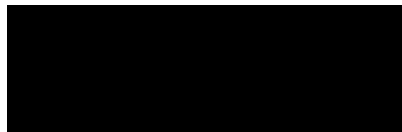
<sup>4</sup> Boog is short for boogaloo, a term used to refer to a second Civil War.


1752 of Title 18, a “restricted building” includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is probable cause to believe that WORKMAN and CLARK violated 40 U.S.C. §§ 5104(e)(2)(D) and (F), which make it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and (F) engage in an act of physical violence in the Grounds or any of the Capitol Buildings;

Your affiant submits there is probable cause to believe that WORKMAN and CLARK violated 18 U.S.C. 231(a)(3), which makes it unlawful to commit or attempt to commit any act to obstruct, impede, or interfere with any fireman or law enforcement officer lawfully engaged in the lawful performance of his official duties incident to and during the commission of a civil disorder which in any way or degree obstructs, delays, or adversely affects commerce or the movement of any article or commodity in commerce or the conduct or performance of any federally protected function. For purposes of Section 231 of Title 18, a federally protected function means any function, operation, or action carried out, under the laws of the United States, by any department, agency, or instrumentality of the United States or by an officer or employee thereof. This includes the Secret Service’s protection of the Vice President and his family and the Capitol Police’s protection of the U.S. Capitol.

Your affiant submits that there is probable cause to believe that WORKMAN and CLARK violated 18 U.S.C. § 111(a)(1) (two counts), which makes it a crime to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in section 1114 of Title 18 while engaged in or on account of the performance of official duties. Persons designated within section 1114 of Title 18 include federal officers such as USCP officers, and include any person assisting an officer or employee of the United States in the performance of their official duties.



Special Agent   
FBI

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
by telephone, this 6th day of August 2024.

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HON. ZIA M. FARUQUI  
U.S. MAGISTRATE JUDGE